

1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE MIDDLE DISTRICT OF ALABAMA  
3           NORTHERN DIVISION  
4

5   JULIE ANN MANGINA,

6                   Plaintiff,

7   vs.

CIVIL ACTION NO.

2:05-CV-485-F

8  
9   CONSECO FINANCE CORP. et al.,

10                   Defendants.  
11  
12

13                   \*   \*   \*   \*   \*  
14  
15  
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17           DEPOSITION OF CHRISTINE RAY KNIGHT,

18   taken pursuant to notice and stipulation on behalf of the  
19   Plaintiff, in the Law Offices of David E. Allred, 7030  
20   Fain Park Drive, Montgomery, Alabama, before Angela  
21   Fulmer, Certified Shorthand Reporter and Notary Public in  
22   and for the State of Alabama at Large, on October 20,  
23   2005, commencing at 10:00 p.m.

APPEARANCES

FOR THE PLAINTIFF:

ANDERSON K. NELMS, ESQUIRE

Attorney at Law

847 S. McDonough Street

Montgomery, Alabama 36104

FOR THE DEFENDANT:

DAVID E. ALLRED, ESQUIRE

Attorney at Law

7030 Fain Park Drive, Suite 9

Montgomery, Alabama 36117

ALSO PRESENT:

Julie Mangina

Kevin Knight

1           able to take that down on her stenographic machine.

2           Do you understand?

3    A.   Yes.

4    Q.   Okay.   How are your currently employed?

5    A.   I'm an Inventory Control Assistant at Greentree  
6        Servicing.

7    Q.   Inventory Control Assistant.   What is that?

8    A.   We repossess mobile homes and sell them.

9    Q.   How long have you been with Greentree?

10   A.   Greentree, since July of '03 or '04.

11   Q.   '03 or '04?

12   A.   I think it was '03.   Uh-huh.

13   Q.   Okay.   And what was your original position as you  
14        were hired in July of '03?

15   A.   I was not hired in '03.   It was Conseco.   And  
16        Greentree bought Conseco.

17   Q.   So you worked for Conseco before it became  
18        Greentree?

19   A.   Correct.

20   Q.   All right.   Same office?

21   A.   Correct.

22   Q.   What did you do for Conseco?

23   A.   I was an Inventory Control Assistant.

1 A. November 14th will be two years.

2 Q. So you were married November the 14th, 2003?

3 A. Correct.

4 Q. All right. In your job position as an Inventory  
5 Control Assistant there at Greentree, do you have  
6 access to computers?

7 A. Yes.

8 Q. All right. Are those computers connected online to  
9 the Internet?

10 A. Yes.

11 Q. All right. Do you have access to TransUnion credit  
12 reports?

13 A. No.

14 Q. Okay. Do you know how to pull a TransUnion credit  
15 report?

16 A. No.

17 Q. All right. Does anybody in your office have access  
18 to TransUnion credit reports?

19 A. Not to my knowledge, no.

20 Q. Nobody can pull a credit report from your office?

21 A. No. Not a credit report, no.

22 Q. All right. You seem to distinguish between credit  
23 report and something else. What other thing are you

1 A. Correct.

2 Q. Okay. What exactly is entailed in reposing a mobile  
3 home?

4 A. I process paperwork. I send out a notice of private  
5 sale, which is a ten-day certified letter. I'm  
6 responsible for having the home picked up and sold.

7 Q. Okay. Do you have occasion where you have a hard  
8 time locating one of the debtors?

9 A. No. I don't locate debtors. I send the mover out  
10 to the physical location.

11 Q. Okay. So you would never have any opportunity in  
12 your job to try to trace down a debtor?

13 A. No.

14 Q. Okay.

15 A. That's not by responsibility.

16 Q. So whether it's your responsibility or not, my  
17 question was, have you ever --

18 A. I do not have access to locate a debtor.

19 Q. Okay. But is it something that you've ever done in  
20 your tenure there at either Conseco or Greentree?

21 A. No.

22 Q. Okay. Did you ever have a telephone conversation  
23 with the plaintiff, Ms. Mangina, wherein you told